

AO 91 (Rev. 11/11) Criminal Complaint

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UNITED STATES DISTRICT COURT

NOV 12 2013

for the

District of Maryland

AT BALTIMORE
CLERK U.S. DISTRICT COURT
DISTRICT OF MARYLAND
DEPUTY

United States of America
v.
ANTHONY DENNIS WILLIAMS II

Case No.

13-2682TJS

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 2010 to 2011 in the county of Anne Arundel in the
District of Maryland, the defendant(s) violated:

Code Section
Title 18 U.S.C., Section 2243

Offense Description
Sexual abuse of a minor

This criminal complaint is based on these facts:
See attached Affidavit incorporated herein by reference.

☒ Continued on the attached sheet.

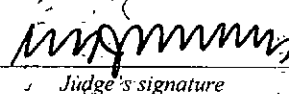

Complainant's signature

Patricia J. Teakle, Special Agent, FBI
Printed name and title

Sworn to before me and signed in my presence.

Date: 11/12/2013

City and state: Baltimore, Maryland


Judge's signature

Timothy J. Sullivan, United States Magistrate Judge
Printed name and title

13-2682TJS

Affidavit in Support of a Criminal Complaint

I, Patricia J. Teakle, ("Your Affiant"), a Special Agent (SA) with the Federal Bureau of Investigation (FBI), Baltimore Division, Baltimore, Maryland, being duly sworn, depose and state as follows:

1. Your Affiant has been a Special Agent (SA) with the FBI since January, 2010. I am currently investigating federal violations concerning child pornography and the sexual exploitation of children. I have gained experience through training in seminars, classes, and daily work related to conducting these types of investigations. Specifically, I have obtained FBI Innocent Images Online Undercover training. I have also participated in the execution of numerous search warrants, of which many have involved child exploitation and/or child pornography offenses. In the course of my employment with the FBI, I have also participated in the execution of numerous search warrants resulting in the seizure of computers, magnetic storage media for computers, other electronic media, and other items evidencing violations of federal laws, including various sections of Title 18, United States Code §§ 2251 and 2252A involving child exploitation offenses.

2. As a federal agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States. This affidavit is submitted in support of a criminal complaint charging ANTHONY DENNIS WILLIAMS II, age 27, of Severn, Maryland, with violating Title 18, United States Code, § 2243, which provides in pertinent part:

Whoever, in the special maritime and territorial jurisdiction of the United States . . . knowingly engages in a sexual act with another person who –
(1) has attained the age of 12 years but has not attained the age of 16 years; and
(2) is at least four years younger than the person so engaging;

or attempts to do so, shall [be guilty of a crime].

3. For the reasons set forth below, I respectfully submit that this affidavit contains ample probable cause to believe that between in or about 2010 and in or about 2011, within the special maritime and territorial jurisdiction of the United States, ANTHONY DENNIS WILLIAMS II, unlawfully, knowingly engaged in a sexual act with other persons who were between the ages of 12 and 16, and were more than four years younger than WILLIAMS.

4. The statements contained in this Affidavit are based on my experience and background as a Special Agent and on information provided by other law enforcement agents. I have not set forth every fact resulting from the investigation; rather, I have included only that information necessary to establish probable cause to charge ANTHONY DENNIS WILLIAMS II, with violating Title 18, United States Code, § 2243.

Probable Cause

5. On July 30, 2013, FBI Special Agent Jacqueline Dougher received information from United States Army (USA), Criminal Investigative Division (CID) Fort Meade, Maryland, that WILLIAMS, a former Youth Counselor at the Fort Meade Child Youth Services (CYS), allegedly sexually assaulted a child (hereinafter referred to as C.F.) who attended the CYS program approximately 1.5 to 2 years ago. WILLIAMS also taught a program at CYS called Passport to Manhood (P2M) which was a life course for juvenile males attending CYS.

6. Information was developed through interviews of C.F. by the Citrus County Sheriff's Office (CCSO), Florida and USA CID, Fort Meade, Maryland. During both interviews, C.F. explained that when he was in the seventh grade, he attended CYS after school and also participated in P2M. One day while at CYS, WILLIAMS asked C.F. if he wanted to go to the attic of the CYS to get equipment. C.F. went to the attic with WILLIAMS, where WILLIAMS

asked him to remove his clothes. C.F. initially denied he and WILLIAMS touched each other, but later stated WILLIAMS made C.F. touch his penis over his clothes.

7. During the interview with CCSO, C.F. recalled that sometime in 2013, he was outside with other children and WILLIAMS at CYS. C.F. stated he and WILLIAMS were having a "twerking"¹ competition. WILLIAMS told C.F. he should do it and C.F. complied.

8. On July 30, 2013, C.F. and his brother were interviewed by USA CID, Fort Meade, Maryland. C.F. provided the aforementioned information to USA CID Agents and stated, "Mr. Tony asked me if I wanted to go to the attic and I said sure. Then that's when we were starting to play the game, and that's when we stopped and he asked me to take off my clothes. I said, no, and we started to play the game again for like 10 seconds. And that's when he grabbed my hand and put my hand on his chest. Then after we rested and then that's when he put my hands on his genital area, then he said, 'Oh Yeah,' then that's when he touched mine." C.F. was approximately 12 years old and WILLIAMS was approximately 25 years old when the incident occurred.

9. On approximately June 23, 2013, C.F., his younger brother (hereinafter referred to as J.F.), and their mother, began their vacation in Savannah, Georgia and later traveled to Florida. In Florida, the mother discovered text messages and videos between WILLIAMS and C.F. She initially reported the information to CCSO.

10. C.F. stated while they were on vacation in Georgia, WILLIAMS utilized the Facebook account of another CYS counselor, "Mr. T. J.", and contacted J.F. via Facebook. WILLIAMS asked for the current phone numbers of C.F. and J.F., which they provided. WILLIAMS requested C.F. and J.F. contact him and sent his cellular telephone number. C.F. stated he did

¹ From the Urban Dictionary, "twerk" is defined as, "The rhythmic gyrating of the lower fleshy extremities in a lascivious manner with the intent to elicit sexual arousal or laughter in ones intended audience."

not have WILLIAMS's phone number prior to receiving the Facebook message. C.F. did not have a wi-fi connection while they were on vacation in Georgia.

11. C.F. was able to establish an Internet connection in Florida and texted WILLIAMS. WILLIAMS texted C.F. and asked C.F. about the incident in the CYS attic. C.F. stated he asked WILLIAMS if "anyone had sucked on his private." C.F.'s mother later advised CCSO that it was WILLIAMS who initiated the inappropriate text conversation with C.F. C.F. admitted WILLIAMS requested he send him a video pretending to "suck D". C.F. sent a video of himself to WILLIAMS simulating oral sex using a microphone. WILLIAMS asked C.F. to play a game called "Truth or Dare". C.F. requested WILLIAMS jump off of his car which he did. WILLIAMS then told C.F. to "twerk" in the bathroom, which he did and sent proof to WILLIAMS via video. C.F. stated "I had to send it to him". WILLIAMS and C.F. exchanged self-made videos of each other that included "twerking".

12. On July 31, 2013, USA CID obtained a consent to search for C.F.'s iPod Touch, and on August 1, 2013, FBI Agents obtained a consent to search two (2) cell phones utilized by C.F. and J.F. The searches revealed that from approximately the middle of June 2013 and/or July 2013, WILLIAMS communicated with C.F. via text messages, and requested C.F. send videos and/or photographs of himself naked and performing sexual acts. WILLIAMS sent C.F. at least one photograph of himself nude and numerous text messages with sexual content. WILLIAMS utilized the telephone number (443)514-4466. Some of the videos sent between C.F. and WILLIAMS, as well as text messages, are sexually explicit in nature and refer to the incident in the attic at CYS when C.F. was in seventh grade. The following is an example of some of those messages from the examination report:

Time	Sender	Recipient	Message
06/07/13 18:53:56 (GMT)	C.F.	+14435144466	I got wifi
06/07/13 18:54:56 (GMT)	+14435144466	C.F.	You free to talk? Or later?
06/07/13 18:54:56 (GMT)	+14435144466	C.F.	Ayy Wassup
06/07/13 18:55:00 (GMT)	C.F.	+14435144466	This is Caleb
06/07/13 18:56:07 (GMT)	C.F.	+14435144466	Yah
06/07/13 18:57:04 (GMT)	+14435144466	C.F.	If you want to
06/07/13 18:57:36 (GMT)	C.F.	+14435144466	U want to talk right now
06/07/13 18:59:12 (GMT)	+14435144466	C.F.	Ok kool So I randomly thought about it the other day...and I remember you saying something bout it last time I was there..have you ever told anybody bout it?
06/07/13 18:59:12 (GMT)	+14435144466	C.F.	Lol I'm bout to eat but we can talk thru here lol
06/07/13 18:59:12 (GMT)	+14435144466	C.F.	Then what are you thoughts bout that day? Just wondering
06/07/13 18:59:21 (GMT)	C.F.	+14435144466	Sure
06/07/13 18:59:50 (GMT)	C.F.	+14435144466	Ok
06/07/13 19:03:28 (GMT)	+14435144466	C.F.	Then ill tell you mine

06/07/13 19:03:28 (GMT)	+14435144466	C.F.	What you mean tho
06/07/13 19:04:17 (GMT)	C.F.	+14435144466	My thoughts are nasty, no self discipline, no self respect, I don't know what I was thinking wen I did that
06/07/13 19:04:37 (GMT)	C.F.	+14435144466	In that's right now
06/07/13 19:05:50 (GMT)	+14435144466	C.F.	What's right now?
06/07/13 19:06:15 (GMT)	C.F.	+14435144466	No I meant that's wat I think about it now
06/07/13 19:07:35 (GMT)	+14435144466	C.F.	Oh ok Yea that day things got a lil crazy and I def wasn't expecting that to happen or for it to go there
06/07/13 19:07:44 (GMT)	+14435144466	C.F.	I was really jokin at first then it turned up fast
06/07/13 19:08:17 (GMT)	C.F.	+14435144466	Yah
06/07/13 19:08:22 (GMT)	C.F.	+14435144466	It did
06/07/13 19:11:17 (GMT)	+14435144466	C.F.	Did you ever tell anyone?
06/07/13 19:12:52 (GMT)	C.F.	+14435144466	No
06/07/13 19:12:56 (GMT)	C.F.	+14435144466	Did u
06/07/13 19:13:32 (GMT)	+14435144466	C.F.	Nope I'm not lol
06/07/13 19:15:04 (GMT)	+14435144466	C.F.	But can I ask you, what got you to the point where you wanted to go along w it? And I. Tell you what it was for me
06/07/13 19:16:16 (GMT)	C.F.	+14435144466	Ummm stupidly I guess

06/07/13 19:17:35 (GMT)	+14435144466	C.F.	Yea I was playin round too then I got super H and I was like ima jus mess w you
06/07/13 19:17:53 (GMT)	C.F.	+14435144466	Oh lol
06/07/13 19:19:12 (GMT)	C.F.	+14435144466	Oh hahahaha
06/07/13 19:19:33 (GMT)	+14435144466	C.F.	You stayed walkin round like that tho! Lol I was like put it away!!! Lol
06/07/13 19:19:58 (GMT)	C.F.	+14435144466	I was acting stupid
06/07/13 19:20:25 (GMT)	+14435144466	C.F.	Lol yea it was funny tho lol You was always wild lol
06/07/13 19:22:40 (GMT)	+14435144466	C.F.	Like real wild lol
06/07/13 19:22:40 (GMT)	+14435144466	C.F.	But I have a wild side too especially back in school lol
06/07/13 19:23:08 (GMT)	C.F.	+14435144466	lkr
06/07/13 19:24:11 (GMT)	C.F.	+14435144466	Yah ik u told us in p2m
06/07/13 19:24:48 (GMT)	+14435144466	C.F.	Yea I told yal a lil bot cuz the rest would've been too much for yal lol
06/07/13 19:24:48 (GMT)	+14435144466	C.F.	Lol it would! Don't try and play me lol
06/07/13 19:25:04 (GMT)	C.F.	+14435144466	Yah sure
06/07/13 19:26:35 (GMT)	+14435144466	C.F.	You'd be like wow lol
06/07/13 19:27:06 (GMT)	C.F.	+14435144466	Speaking of play wat game did u want to play

06/07/13 19:29:04 (GMT)	+14435144466	C.F.	Lol you prob wouldn't wanna play lol
06/07/13 19:31:12 (GMT)	+14435144466	C.F.	You ain't ready for that lol
06/07/13 19:32:29 (GMT)	C.F.	+14435144466	Wat game is it
06/07/13 19:33:20 (GMT)	+14435144466	C.F.	Lol T or D
06/07/13 19:33:20 (GMT)	+14435144466	C.F.	I was jus gonna see if you wanted to cuz I'm bored lol
06/07/13 19:33:20 (GMT)	+14435144466	C.F.	Lol you wanna play?
06/07/13 19:34:11 (GMT)	C.F.	+14435144466	D
06/07/13 19:35:28 (GMT)	+14435144466	C.F.	Lol aite rules real quick Lol first all D have to be proven by a pic or video and all T have to be answered honestly...

13. On October 7, 2013, WILLIAMS was voluntarily interviewed by SA Dougher and Special Agent DeShannon Adams, Army CID, at his residence, 1361 Ava Road, Severn, Maryland. WILLIAMS advised he was a counselor at CYS for approximately eight (8) years, and ran the Passport to Manhood (P2M) program for the boys at CYS. WILLIAMS initially denied he and C.F. ever went into the attic at CYS and denied he touched C.F. inappropriately. WILLIAMS was then confronted by the interviewing Agents with the text messages he and C.F. sent, and admitted he played a texting game of "Truth or Dare" (AKA: T or D) with C.F. and, as part of the game, requested C.F. video himself or take pictures doing certain things like "twerking". WILLIAMS admitted he sent photographs of his penis to C.F. and stated "I'm telling you the honest truth", there was no kissing and the touching of C.F. [in the attic], and it could have happened accidentally when he picked C.F. up (WILLIAMS stated they were wrestling).

WILLIAMS stated he never put C.F.'s hand to his chest or genitals. WILLIAMS knew C.F. was 13 years old when the incident happened, and stated he just knew "it was wrong, period."

14. WILLIAMS admitted that another counselor at CYS knew WILLIAMS was using his Facebook account to contact C.F. and other children but that counselor did not know about the exchange of any videos or pictures between C.F. and WILLIAMS. The other counselor was interviewed and confirmed he did not know about any videos or images sent between WILLIAMS and any of the children. WILLIAMS admitted he played "Tor D" with another minor male (hereinafter referred to as D.G.), but denied any other contact with D.G. WILLIAMS voluntarily agreed to a consent to search his phone. Texts messages were located on the phone between WILLIAMS, D.G, and other possible children from CYS.

15. On October 17, 2013, D.G was interviewed and stated that WILLIAMS took him to the attic at CYS and solicited oral sex from him, but denied that any sexual contact occurred. D.G. stated that WILLIAMS requested pictures of D.G.'s genitals which he sent to WILLIAMS because he felt pressured.

16. The forensic exam of WILLIAMS's phone was reviewed by SA Dougher and text messages via Kik Messenger revealed explicit text messages between D.G. and WILLIAMS in 2013 and references to the sexual activity in the CYS attic.

16. On October 31, 2013, D.G contacted SA Dougher and stated that he felt ready to tell what had happened to him with WILLIAMS at the CYS. D.G. stated he did not feel ready to tell everything that had happened with WILLIAMS when he was previously interviewed. D.G. stated WILLIAMS did sexually abuse him in the attic at CYS. The first time sexual activity happened between D.G. and WILLIAMS was about 3 to 4 years ago, when D.G was approximately 12 or 13 years old and in eighth grade.

17. WILLIAMS started by touching D.G.'s penis through his pants and then told D.G. to take his pants off and sit in the chair. WILLIAMS began to perform oral sex on him. "He could tell I didn't like it because I wasn't sexually turned on by that, but as it progressed he was like well I did this for you so you have to do this for me". WILLIAMS reassured D.G., and told him when he was D.G.'s age he did that and it was fine. WILLIAMS then pulled down his pants and told D.G. to touch his penis first, then took D.G.'s hand and made ^{D.G.}him "manually stimulate [him] with my hand" and then told D.G. to give him oral sex. D.G. then gave WILLIAMS oral sex. After approximately five (5) to ten (10) minutes, WILLIAMS ejaculated on to the attic floor.

18. D.G. stated the second time sexual activity occurred with WILLIAMS, he was unable to recall exactly how old he was, but thought he was approximately 14 years old. WILLIAMS texted D.G and they went into the attic at CYS. WILLIAMS told D.G. he bought condoms. They went to the attic and WILLIAMS lay down on the floor and told D.G. he wanted to have anal sex with him and it would be fine because he did it at D.G.'s age. D.G. stated WILLIAMS said "It would go through and be fine". WILLIAMS put on a condom and told D.G. "just sit on my penis and ride it because it will be easier that way". WILLIAMS directed D.G. to sit on his penis. WILLIAMS stood up and took the condom off and asked D.G. for oral sex and D.G. performed orals sex on WILLIAMS. WILLIAMS stood up and ejaculated on the attic floor. D.G. verified that WILLIAMS did penetrate his anus with WILLIAMS' penis.

19. D.G. stated he sent pictures to WILLIAMS of his penis and buttocks. The pictures were taken after the second time sexual activity occurred in the CYS attic. D.G. stated he knew when WILLIAMS would text him that WILLIAMS wanted pictures of his penis and buttocks. WILLIAMS specifically asked D.G. for those pictures. D.G. and WILLIAMS usually texted about other things before WILLIAMS asked for the pictures. The bulk of the pictures were

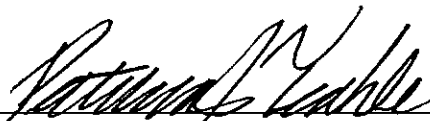
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requested through regular texting and some may have been through a cell phone application.

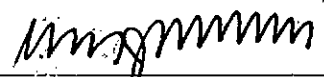
D.G. stated he was "easily phased by what [WILLIAMS] said since I did trust him."

20. On July 31, 2013, a public data base search for an ANTHONY WILLIAMS II was conducted and revealed an Anthony D. Williams II with a date of birth 1986, Social Security Account Number XXX-XX-6175, with at least three different recent addresses in and around Severn, MD. On August 2, 2013, a co-worker of WILLIAMS was interviewed by SA Dougher and SA Dillon Rathbun, USA CID, who advised WILLIAMS currently lived on Ava Road in Severn, MD.

22. Based upon the foregoing, your Affiant respectfully submits that there is probable cause to believe that ANTHONY DENNIS WILLIAMS II violated Title 18, United States Code, Section 2243, and requests that this court issue a warrant for the arrest of ANTHONY DENNIS WILLIAMS II for said offense.


Patricia J. Teakle, Special Agent,
Federal Bureau of Investigation

Subscribed and sworn to before me this 12th day of November, 2013.


Timothy J. Sullivan
United States Magistrate Judge